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March 11, 2019

Via ECF and First Class Mail

The Honorable Joel Schneider, U.S.M.J.
United States District Court for the District of New Jersey
Mitchell H. Cohen Building & U.S. Courthouse
4th & Cooper Streets
Camden, NJ 08101

**Re : Strike 3 Holdings, LLC v. John Doe subscriber assigned IP address
173.71.68.16
Dkt. No. 1:18-cv-02674-RBK-JS**

**Strike 3 Holdings, LLC v. John Doe subscriber assigned IP address
76.116.36.190
Dkt. No. 1:18-cv-12585-JBS-JS**

**Strike 3 Holdings, LLC v. John Doe subscriber assigned IP address
76.116.76.28
Dkt. No. 1:18-cv-12586-JHR-JS**

**Strike 3 Holdings, LLC v. John Doe subscriber assigned IP address
73.160.162.60
Dkt. No. 1:18-cv-14114-JHR-JS**

Judge Schneider:

As you know, we represent Plaintiff Strike 3 Holdings, LLC (“Strike 3”) in the above-referenced matters. I write to provide a revised declaration in support of Mr. Bandlow’s applications for *pro hac vice* admission in these matters, which are currently pending before the Court. Although Mr. Bandlow’s original declaration in support of *pro hac vice* admission disclosed his only bar membership, it omitted his admission to practice before four U.S. District Courts in California, and the Court of Appeals for the Ninth Circuit. Although Local Civil Rule

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101.1(c)(1) requires only a certified statement “disclosing each bar in which the applicant is a member in good standing,” in an abundance of caution, I submit this revised declaration including Mr. Bandlow’s court admissions, as well.

In addition, although not required by Local Civil Rule 101.1, *see In re Passaic Healthcare Servs., LLC*, No. 14-36129, 2015 WL 5895514 (Bankr. D.N.J. Oct. 8, 2015), in the interest of full candor to the Court, I note that after submitting his original declaration, Mr. Bandlow was fined \$750 for missing deadlines to file initial status reports in Strike 3 matters in the Eastern District of California. *See Strike 3 v. John Doe*; Dkt. No. 18-1075, ECF No. 20 (E.D. Cal. Feb. 26, 2019). This fine was paid immediately.

Finally, I write to advise the Court that Defendant’s counsel has not responded to any of my attempts to contact him, via email and phone, to obtain his consent to Mr. Bandlow’s application for *pro hac vice* admission in this matter, and that the deadline to oppose the motion has passed. L. Civ. R. 78.1(d)(2).

Thank you for your attention to this matter.

Respectfully submitted,

/s/ John C. Atkin

John C. Atkin

cc: All Counsel of Record (via ECF)
Lincoln Bandlow, Esq. (via Email)